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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
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12 WAYMO, LLC,

13 Plaintiff,

14 v.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; and OTTO TRUCKING
17 LLC

18 Defendants.
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CASE NO. 3:17-CV-00939

**WALTER C. PFEFFER'S
DECLARATION IN SUPPORT OF
NONPARTIES AURORA INNOVATION,
INC., CHRISTOPHER URMSON, NURO,
INC., AND DAVID FERGUSON'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL DEFENDANTS'
OPPOSITION TO DISCOVERY LETTER
BRIEF**

Date: TBD

Time: TBD

Courtroom: F (15th Floor)

Judge: Hon. Jacqueline Scott Corley

Trial Date: October 2, 2017

I, Walter C. Pfeffer, declare as follows:

1. I am an associate at the law firm of Singer Bea LLP representing nonparties Aurora Innovation, Inc., Christopher Urmson, Nuro, Inc., and David Ferguson (together, the “Nonparties”). I am a member in good standing of the Bar of the state of California. I make this declaration based upon matters within my personal knowledge and, if called as a witness, could and would testify competently to the matters set forth herein. I make this declaration in support of the Nonparties Motion to File Under Seal Defendants’ Opposition to Discovery Letter Brief.

2. I have reviewed Defendants Uber Technologies, Inc. and Ottomotto LLC’s (“Defendants”) Opposition to the Nonparties’ Discovery Letter Brief (Dkt. 1264) (“Opposition”) and determined that the Opposition contains information that merits the designation of “Highly Confidential — Attorneys’ Eyes Only” pursuant to the Protective Order in this case, and should be sealed accordingly.

3. Given the exigent circumstances of the public filing of the Opposition, the Nonparties’ request to seal is narrowly tailored in accordance with the Local Rules of the Northern District of California and the Protective Order. Should Defendants wish to submit a redacted version, or should the Court wish that the Nonparties do so, the Nonparties would cooperate fully with that request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 18, 2017 in San Francisco, California.



Walter C. Pfeffer